

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

Six Star Holdings, LLC et al.

v.

Case No. 2:10-cv-893

City of Milwaukee

**PLAINTIFFS' SUPPLEMENTAL Rule 26(a)(1) DISCLOSURES
RELEVANT TO DAMAGES**

To: Counsel for Defendant
Assistant City Attorney Adam B. Stephens
Milwaukee City Attorney's Office
200 E Wells St., Rm 800
Milwaukee, WI 53202-3515

The Plaintiffs, by their attorneys, The Jeff Scott Olson Law Firm, by Attorney Jeff Scott Olson, hereby make the following supplemental disclosures regarding evidence (in addition to those provided previously in discovery throughout this lawsuit) that is likely to be relevant to damages issues, as required by Fed. R. Civ. Pro., Rule 26 (a)(1).

(A) The name and, if known, the address and telephone number of each individual likely to have discoverable information the disclosing party may use to support his claims or defenses, unless solely for the purposes of impeachment, identifying the subjects of information:

Ms. Cherie Ferraro
2654 Fulton Street
Milwaukee, 53207
414-690-5093

Subject of Information:

Ms. Ferraro was Jon Ferraro's first employer at DeMarini's Pizzeria. She has knowledge of his work skills in the service industry

Mr. Scott Krah¹
c/o The Jeff Scott Olson Law Firm, S.C.
131 W. Wilson Street # 1200
Madison, Wisconsin 53703
608-283-6001

Subject of Information:

Mr. Krah is a member of and an investor in Joscojo, Inc., JSJC, Inc., and Midrad, LLC. He has information about the profitability of gentlemen's clubs, the effectiveness of the Silk management team, and the opening of a "dry" club, but for the unconstitutional Milwaukee ordinance.

Mr. Ricky Lea
262-705-9081

Subject of Information:

Mr. Lea owns Ricky's Valet Service. He has knowledge of the arrangements made to provide valet service for Silk at the Pittsburgh Avenue location.

¹ The witnesses for whom an address of "c/o The Jeff Scott Olson Law Firm, S.C." is given are either members of a corporation or current employees of a corporation represented by this firm. Their addresses have been furnished in previous discovery responses, but arrangements for interviews or depositions of these witnesses should be made through our office.

Mr. Mike Meyer
MDM Builders LLC
621 Bayberry Lane
Slinger, WI, 53086
414-807-3132

Subject of Information:

Mr. Meyer is one of two general contractors who have done remodeling work for Silk clubs. He had knowledge of what is required to convert a space to one that is suitable for opening a club.

Ms. Meri Misko
7791 Wynhham Hills Pkwy
Franklin, WI 53132
414-690-7755

Subject of Information:

Ms. Misko was previously an employee at Silk. She has knowledge of the pre-opening training the staff goes through and information about certain aspects and standards of employment at Silk.

Mr. Joe Modl
c/o The Jeff Scott Olson Law Firm, S.C.
131 W. Wilson Street # 1200
Madison, Wisconsin 53703
608-283-6001

Subject of Information:

Mr. Modl is a member of and an investor in Joscojo, Inc., JSJC, Inc., and Midrad, LLC. He has information about the profitability of gentlemen's clubs, the effectiveness of the Silk management team, and the proposed opening of a "dry" club but for the unconstitutional Milwaukee ordinance.

Mr. Jason Pipkorn
J. Pipkorn Construction
3645 Division Road
Jackson, WI 53037
414-916-4642

Subject of Information:

Mr. Pipkorn is one of two general contractors who have done remodeling work for Silk clubs. He had knowledge of what is required to convert a space to one that is suitable for opening a club.

Mr. Craig Ploetz
c/o The Jeff Scott Olson Law Firm, S.C.
131 W. Wilson Street # 1200
Madison, Wisconsin 53703
608-283-6001

Subject of Information:

Mr. Ploetz is a member of and an investor in Joscojo, Inc., JSJC, Inc., and Midrad, LLC. He has information about the profitability of gentlemen's club, the effectiveness of the Silk management team, and the proposed opening of a "dry" club but for the unconstitutional Milwaukee ordinance. He is also the Chief Operating Officer at Silk and has information about the day-to-day operations and the history of those operations.

Ms. Jade Simone
4381 W. Flamingo
Las Vegas, NV 89103
813-495-4188

Subject of Information:

Ms. Simone is a performing artist who entertains in adult clubs and other venues across the nation. She has information about the professional manner in which the Silk clubs are run.



Ms. Jen Spaeth

c/o The Jeff Scott Olson Law Firm, S.C.
131 W. Wilson Street # 1200
Madison, Wisconsin 53703
608-283-6001

Subject of Information:

Ms. Spaeth is the head of waitstaff at Silk Milwaukee. She has knowledge of the day to day operations of providing food and beverage service at a gentlemen's club.

Mr. Perry Wilk

c/o The Jeff Scott Olson Law Firm, S.C.
131 W. Wilson Street # 1200
Madison, Wisconsin 53703
608-283-6001

Subject of Information:

Mr. Wilk is the General Manager of Silk Exotic Gentlemen's Club in Milwaukee. He has information about the day-to-day operations there and about the scope and coverage of management in the event of expansion.

Mr. Gregory Wojczak

12602 W. Hampton Avenue
Butler, WI 53007-1706

Subject of Information:

Mr. Wojczak has been the accountant for the Silk Clubs since they opened. He has knowledge about the preparation of profit & loss statements and tax returns for the clubs.

Mr. Kyle Zubke

c/o The Jeff Scott Olson Law Firm, S.C.

131 W. Wilson Street # 1200

Madison, Wisconsin 53703

608-283-6001

Subject of Information:

Mr. Zubke is the General Manager of Silk Exotic Gentlemen's Club in Madison. He has information about the day-to-day operations there and about the scope and coverage of management in the event of expansion.

In addition, should the parties agree on the terms of a protective order that will protect the identity of exotic dancers, one or more dancers will testify. They have information about financial arrangements between dancers and the club.

(B) A copy of, or a description by category and location of, all documents, electronically stored information, and tangible things in the possession, custody, or control of the party and the disclosing party may use to support its claims or defenses, unless solely for impeachment:

- 1) There will be a video of nude dance performance, the type that would have been featured if Ferol had been allowed to open as a theater.
- 2) There will be a mock-up of the interior of the club as it would have existed had Ferol been allowed to open as a theater.

Neither of these has been prepared as of this date.

Dated this 21st day of April, 2014.

Submitted on behalf of
Six Star Holdings, LLC, and Ferol, LLC,
Plaintiffs

By



THE JEFF SCOTT OLSON LAW FIRM, S. C.

JEFF SCOTT OLSON

State Bar Number 1016284

131 West Wilson Street, Suite 1200

Madison, Wisconsin 53703-3245

Phone: (608) 283-6001

Facsimile: (608) 283-0945

Email: jsolson@scofflaw.com



Jeff Scott Olson